

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff / Counterclaim Defendant,

v.

ALAN DERSHOWITZ,

Defendant / Counterclaim Plaintiff

Case No. 19-cv-03377-LAP

**DECLARATION OF CHRISTIAN G. KIELY**

I, Christian G. Kiely, hereby declare as follows:

1. I am counsel to Defendant and Counterclaim Plaintiff Alan Dershowitz in this action. I make this declaration in support of Professor Dershowitz's Motion to Disqualify Cooper & Kirk PLLC.

2. Attached hereto as Exhibit A is a true and correct copy of Plaintiff and Counterclaim Defendant Virginia Roberts Giuffre's ("Plaintiff") Motion for Joinder filed in *Jane Doe #1 and Jane Doe #2 v. United States*, 9:08-cv-80736-KAM (S.D. Fla.).

3. Attached hereto as Exhibit B and submitted under seal is a true and correct copy of Plaintiff's sealed appellate brief in *Giuffre v. Maxwell*, 16-3945-cv-(L) (2d Cir.).

4. Attached hereto as Exhibit C is a true and correct copy of Plaintiff's LR 56.1 Statement of Contested Facts filed in *Giuffre v. Maxwell*, 15-cv-7433 (S.D.N.Y) ("*Giuffre v. Maxwell*"), and unsealed by the Second Circuit on August 9, 2019.

5. Attached hereto as Exhibit D and submitted under seal is a true and correct copy of an excerpt of the deposition transcript of Anthony Figueroa from *Giuffre v. Maxwell*.

6. Attached hereto as Exhibit E and submitted under seal is a true and correct copy of an excerpt of the deposition transcript of James Michael Austrich from *Giuffre v. Maxwell*.

7. Attached hereto as Exhibit F and submitted under seal is a true and correct copy of an excerpt of the deposition transcript of Sky Roberts from *Giuffre v. Maxwell*.

8. Attached hereto as Exhibit G and submitted under seal is a true and correct copy of an excerpt of the deposition transcript of Chris Anderson, Ph.D. from *Giuffre v. Maxwell*.

9. Attached hereto as Exhibit H and submitted under seal is a true and correct copy of an excerpt of the deposition transcript of Gilbert W. Kliman, M.D. from *Giuffre v. Maxwell*.

10. Attached hereto as Exhibit I is a true and correct copy of a pleading entitled Reply Memorandum of Law in Further Support of Non-Party Sharon Churcher's Motion to Quash Subpoena filed in *Giuffre v. Maxwell* on July 5, 2016.

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Christian G. Kiely  
Christian G. Kiely

Dated: November 18, 2020

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was sent via the Court's electronic filing system, and served to all counsel of record on November 18, 2020.

/s/ Christian G. Kiely  
Christian G. Kiely